

ORIGINAL

FILED
U.S. DISTRICT COURT
NORTHERN DIST. OF TX
FT. WORTH DIVISION

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

2014 MAY 23 PM 3:32

CLERK OF COURT

UNITED STATES OF AMERICA

v.

CARY J. HUDSON (01)

No.

4-14 CR 1.15-A

INFORMATION

The United States Attorney charges:

Count One

False Document Submitted to an Agency of the United States
(Violation of 18 U.S.C. § 1001(a)(3))

Introduction

1. The Federal Bureau of Prisons (“BOP”) is an agency within the executive branch of the United States government that, among other things, is responsible for the custody and care of federal inmates.
2. Integrated Medical Solutions (“IMS”) is a private, for-profit federal contractor that competes for open-market contracts administered by the BOP for inmate health care services at BOP institutions nationwide. IMS was incorporated in 2003.
3. Defendant **Cary J. Hudson** has been employed as a Financial Administrator by the BOP since 1999. **Hudson** has worked at Federal Correctional Institutions in Seagoville and Fort Worth, Texas, and the Federal Medical Center, “FMC Carswell,” in Fort Worth, Texas.

4. BOP employees with fiduciary and management responsibilities are required to file annual Financial Disclosure Reports, disclosing any outside positions, employment, and income. These disclosures are made through an Office of Government Ethics Form 450 (“OGE-450 Form”). Government officials review OGE-450 Forms in an effort to identify conflicts of interests between BOP employees and private entities doing business with the BOP, or seeking business with the BOP. A conflict of interest could, among other things, provide a BOP contractor an economic advantage over others, and defeat the government’s attempt to secure a competitive contract.

False Document

On or about February 12, 2013, in the Fort Worth Division of the Northern District of Texas, defendant **Cary J. Hudson** did willfully and knowingly make and cause to be made, and use and cause to be used, in a matter within the jurisdiction of the executive branch of the United States government, a false writing or document, knowing the same to contain a materially false, fictitious, and fraudulent statement or entry, to wit: **Hudson** submitted an OGE-450 Form to the BOP and stated therein that he had no reportable outside position when, as **Hudson** well knew, he had a business relationship with IMS, where he acted as a consultant and received money for his services.

In violation of 18 U.S.C. § 1001(a)(3).

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